

RENE L. VALLADARES  
Federal Public Defender  
State Bar No. 11479  
NISHA BROOKS-WHITTINGTON  
Assistant Federal Public Defender  
411 E. Bonneville, Ste. 250  
Las Vegas, Nevada 89101  
(702) 388-6577/Phone  
(702) 388-6261/Fax  
Nisha Brooks-Whittington@fd.org

Attorney for Richard Lee Trimmer

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
RICHARD LEE TRIMMER,  
Defendant.

Case No. 2:97-cr-00088-RFB

**STIPULATION TO CONTINUE  
PROPOSED RELEASE PLAN  
DEADLINE AND HEARING  
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Steven Myhre, Acting United States Attorney, and Patrick Burns, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Nisha Brooks-Whittington, Assistant Federal Public Defender, counsel for Richard Lee Trimmer, that the Proposed Plan Deadline currently scheduled for July 3, 2017, and the Hearing currently scheduled for July 13, 2017 at 11:30 a.m., be vacated and continued to a date and time convenient to the Court, but no sooner than sixty (60) days.

This Stipulation is entered into for the following reasons:

1. Undersigned counsel is working with the Bureau of Prisons (“BOP”) and the United States Probation Office (“USPO”) on a possible release plan. Additional time is

requested for the BOP and USPO to further research and investigate at least two possible residential facilities that may meet Mr. Trimmer's needs, and thereafter to allow counsel time to prepare a proposed release plan to submit to this Court.

2. The defendant is in custody and agrees with the need for the continuance.

3. The parties agree to the continuance.

This is the first request for a continuance of the proposed plan deadline and hearing.

DATED this 30<sup>th</sup> day of June, 2017.

RENE L. VALLADARES  
Federal Public Defender

STEVEN MYHRE  
Acting United States Attorney

/s/ *Nisha Brooks-Whittington*  
By \_\_\_\_\_

*/s/ Patrick Burns*  
By \_\_\_\_\_  
**PATRICK BURNS**  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Case No. 2:97-cr-00088-RFB

Plaintiff,

V.

RICHARD LEE TRIMMER,

## ORDER

Defendant.

IT IS THEREFORE ORDERED that the Proposed Release Plan deadline currently scheduled for July 3, 2017 be vacated and continued to September 13, 2017 and hearing currently scheduled for July 13, 2017 at 11:30 a.m., be vacated and continued to September 20, 2017 at 11:30 a.m.

DATED this 30th of June, 2017.

SB

RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE